

DRAFT FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT INFORMATION FOR THE READER

This document consists of the Draft Final Environmental Impact Report (FEIR) for the proposed Property Specific Requests General Plan Amendment and Rezone (“Proposed Project”). The EIR text is preceded by the List of Persons, Organizations, and Public Agencies that Commented on the Draft Subsequent EIR (DSEIR) dated December 2017; Comments and Responses on the DSEIR; and the Statement of Location and Custodian of Documents.

The DEIR was previously circulated for public review from December 14, 2017 to February 12, 2018. All interested persons and organizations had an opportunity during this time to submit their written comments on the DSEIR to the County of San Diego. In response to comments received from the circulation of the DSEIR and recent approval of the County’s Climate Action Plan on February 14, 2018, minor revisions were made to portions of the environmental analysis. Minor revisions were also made for purposes of clarification. The following table contains a list and description of all changes that have been made to the DSEIR.

Section (Page)	Change	Reason for Change
Section 1.1.1, page 1-1	Revised sentence to state “... will have the responsibility for <u>its evaluation and consideration for possible</u> subsequent approval.”	Clarification
Section 1.3.4, page 1-10	Revised sentence to state: “As described under Goal M-2 of the Mobility Element, there are instances where it is more appropriate to retain a road classification <u>(which determines the number of travel lanes)</u> that could result in LOS E/F operations rather than change the Mobility Element classification to increase the number of travel lanes.	Clarification
Section 1.7.1, page 1-12	Revised second sentence of third paragraph to read: “The traffic study used a 2014 baseline by <u>starting with the traffic volumes contained in the Mobility Element of the County General Plan 2011 PEIR and</u> adding the traffic from adopted year 2014 GPAs, to the traffic volumes contained in the Mobility Element of the County General Plan. ”	Clarification
Section 1.9, end of section	New paragraph added describing the preliminary policy analysis reports that were prepared for the PSR areas.	Clarification and in response to comment O3-A-3.
Section 1.11.1, page 1-17	Revised first paragraph to read: “Such projections were based upon data maintained by SANDAG and the Southern California Association of Governments (SCAG) for the San Diego County region to the year 2030, and are no longer <u>available</u> applicable for the Proposed Project. As such, the Proposed Project will utilize the <u>2011 PEIR information and an available</u> updated SANDAG <u>regional model.</u> 2050 growth projections. SANDAG is largely	Clarification

	responsible for maintenance of economic, demographic, land use, and transportation data projections for both the County and the incorporated cities. Therefore, the cumulative analysis in this SEIR utilizes the same methodology for population and employment projections as presented in the 2011 PEIR from the following sources.”	
Section 1.11.10, page 1-25	Revised sentence as follows: “the applicant (<u>Murai-Sab, LLC (ColRich)</u>) has proposed an 89-unit clustered...”	Clarification
Figure 1-1 Countywide PSR Analysis Areas	Figure 1-1 has been replaced. It was an older version with a reference to NC42.	Accuracy, to remove reference to PSR NC42.
Section 2.1.3.1, under heading Crest-Dehesa Subregion	Revised sentence as follows: “PSR Analysis Area CD14 <u>proposes land uses that would result in 7 additional potential dwelling units and is located</u> mostly on an undeveloped hillside, providing scenic views from public roads and residences in the neighborhood to the west.”	Clarification, consistency.
Section 2.1.3.1, under heading North County Metro Subregion	Revised sentences as follows: “Construction and operation impacts would have the potential to <u>add 11 potential dwelling units</u> that could detract from the scenic views from the Daley Ranch trails.” And “Construction and operation impacts would have the potential to <u>add 52 potential dwelling units</u> that could detract from the scenic views of the Analysis Area.”	Clarification consistency.
Section 2.1.3.1, under heading San Dieguito	Revised sentences as follows: “Construction and operation impacts would have the potential to <u>add 301 potential dwelling units</u> that could detract from the scenic views of the Analysis Area.”	Clarification consistency.
Section 2.2.2	Revised text as follows: “The regulatory framework described in the 2011 PEIR are the same as the regulatory framework evaluated in this SEIR, <u>except for the following additions:-</u> <u>The County Board of Supervisors approved the Agriculture Promotion Program (POD-14-001) and certified the project EIR on March 15, 2017. The program included Zoning Ordinance amendments and permit processing improvements to promote agricultural uses and production in the unincorporated area of the County.</u> <u>Subsequent to the approval of the General Plan Update in 2011, the CEQA guidelines were amended to include consideration of potential impacts to forestry resources. Potential impacts to forestry resources are addressed in the analysis for the Proposed Project, and is presented in Section 2.2.3.4 below.</u> No other changes to the regulatory framework have been identified that would alter the conclusions from the 2011 PEIR.”	Text revised in response to comment O3-33
Section 2.2.3.1, 2 nd paragraph of Impact Analysis	Revised sentence to state: “Therefore, any parcels <u>with a density of smaller than one dwelling unit per acre or more</u> have been calculated to result in a 100 percent conversion	Clarification

	of agricultural resources to non-agricultural uses for the purposes of this analysis.”	
Table 2.4-2 Estimated Vegetation Classification Acreages...	Revised to remove row stating <1 acre of Orchards/Vineyards for SD15, as there are none.	Accuracy and Response to Comment I25-10.
Section 2.7.5.8	Revised text as follows: Implementation of the following adopted General Plan policies and 2011 PEIR mitigation measures would reduce the direct Impact HZ-2 and <u>cumulative Impact HZ-3</u> former CGSP but not to a level below significant; ”	Text revised for accuracy as cumulative impact HZ-3 had not been included in the sentence.
Page 2.8-4, under heading Sustainable Groundwater Management Act of 2014	Added the following text at the end of the discussion of SGMA: <u>“PSR Analysis Areas DS8 and DS24 are located within the Borrego groundwater basin. The County has also been coordinating with Mootamai Municipal Water District (MWD), Pauma MWD, Pauma Valley Community Services District, Upper San Luis Rey Resource Conservation District, Valley Center MWD and Yuima MWD, to act as a single multi-agency Groundwater Sustainability Agency (GSA) to develop a single Groundwater Sustainability Plan (GSP) for the San Luis Rey Valley groundwater basin. All but the very southern portion of PSR Analysis Area PP30 is located in the Pauma Subbasin of this groundwater basin and will be subject to the GSP when approved. The County is also coordinating with other agencies to develop GSPs for the San Diego River Valley and San Pasqual Valley groundwater basins. There are no PSR Analysis Areas located in these basins.”</u>	Text revised to describe status of other groundwater basins subject to SGMA.
Section 2.8.5.1, under heading Infeasible Mitigation Measures	Revised sentence as follows: “The County has determined the following measures to be infeasible <u>in the 2011 GPU PEIR</u> ; these measures <u>are still infeasible for the same reasons as stated and</u> will not be implemented.”	Clarification
Section 2.8.5.4, under heading Adopted 2011 PEIR Mitigation Measures	Revised text as follows: “In addition to the 2011 PEIR mitigation measures listed below, mitigation measures Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, and Hyd-2.5 listed in Sections 2.8.5.1 and 2.8.5.2 for Issues 1 and 2 would reduce direct Impact HY-4 and cumulative Impact HY-13 to a level below significant and are incorporated here by reference.”	Text revised for accuracy as there was no identification of a cumulative impact HY-13.
Section 2.9.3.2 under heading San Diego County 2011 General Plan Update	Revised two sentences as follows: “The goals not listed do not contain underlying policies determined to be applicable to stand-alone GPAs/Rezones <u>and were not</u> relied upon in the 2011 PEIR to reduce environmental impacts.” And – “Those policies that are not applicable to a stand-alone GPA/Rezone, or <u>and</u> were not relied upon in the 2011	Clarification

	PEIR to reduce environmental impacts are not discussed below.”	
Page 2.9-16 under discussion of DS8	Revised sentence as follows: “However, this noted inconsistency has not been determined to constitute a significant impact, because there is room for discretion by decision makers to weigh other factors more heavily than the high level of unbuilt planned density and groundwater critical overdraft situation, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Page 2.9-17 under discussion of DS24	Revised sentence as follows: “Though the LU-2.3 language requires some judgement by decision makers, there is overwhelming <u>substantial</u> evidence in the record to indicate inconsistency with this policy.”	Clarification
Page 2.9-18 under discussion of FB2+	Revised sentence as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh various factors in determining whether a greenbelt would be sufficiently maintained, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Page 2.9-19 under discussion of FB21+	Revised sentence as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Page 2.9-28 under discussion of BO18+	Revised sentence as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of the proposed SR-4 density as it relates to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Page 2.9-31 under discussion of FB2+ for Policy LU-6.2 and LU-6.11	Revised two sentences as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Page 2.9-33 under discussion of FB21+	Revised sentence as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is some room for judgement of decision makers to weigh other factors more heavily in evaluating policy consistency, including the Conservation Subdivision requirement, which would remain under the proposed SR-10 designation, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification

Page 2.9-40 under discussion of Former Champagne Gardens Specific Plan Area	Revised sentence as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency, including the proximity to the Welk Resort to the south, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Page 2.9-55 under discussion of DS24	Revised sentence as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because the inconsistency is based on the weighing of several factors in the planning analysis. There is room for discretion by decision makers in weighing other factors as they relate to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Section 2.9, page 2.9-57	Added text describing how NC37 comports with GP Policy COS-14.1.	Review of NC37 with respect to Policy COS-14.1 was inadvertently left out of Draft SEIR, and in response to comment II-7.
Page 2.9-58 under discussion of PP30	Sentences revised as follows: “There is room for discretion by decision makers in weighing other factors as they relate to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and The mitigation measures outlined in Section 2.3 (Air Quality) and in this section would apply to future development.”	Clarification
Page 2.9-61 under discussion of BO18+	Sentences revised as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of the proposed SR-4 density as it relates to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.”	Clarification
Page 2.9-65 under discussion of NC38+	Sentence revised as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification

Page 2.9-68 under discussion of Former Champagne Gardens Specific Plan Area	Sentence revised as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ”	Clarification
Page 2.9-70 under discussion of NC38+	Sentences revised as follows: “However, these noted inconsistencies have not been determined to constitute significant impacts because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.”	Clarification
Page 2.9-72 under discussion of Former Champagne Gardens Specific Plan Area	Sentences revised as follows: “However, these noted inconsistencies have not been determined to constitute significant impacts because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.”	Clarification
Page 2.9-75 under discussion of Sphere of Influence	Text revised as follows: “The proposed land use designation for PSR Analysis Area SD15 would be C-1 (0.45 <u>0.70</u> FAR) with mixed use zoning at two dwelling units per acre, SR-0.5 (one dwelling unit per 0.5, 1, or 2 acres), and VR-10.9 (10.9 dwelling units per one acre).”	Accuracy
Section 2.9.5.2 under the heading Mitigation Measures	Revised text as follows: “Implementation of mitigation measures M-Air-1.1 and M-Air-1.2 as listed in Section 2.3.5.1 for Issue 1, <u>and mitigation measure M-Pop-1.1 as listed in Section 2.12.5.1 for Issue 1 of this SEIR would reduce</u> Impact LU-1 and Impact LU-2 and are incorporated here by reference.”	Accuracy, consistency with Table S-1.
Section 2.13.3.1, last paragraph	Revised text as follows: “Under the Proposed Project, increasing allowable land use density within PSR Analysis Areas BO18+, DS24, FB2+, FB17, FB21+, NC18A, NC22, NC37, NC38+, SD15, and VC51 would reduce allowed <u>emergency response travel response times</u> , in areas where <u>This could result in future development within these PSR Analysis Areas that cannot meet emergency response travel response times without the provision of additional access roads and/or new or physically altered facilities.</u> ”	Clarification
Section 2.15.1	Revised text as follows: “The baseline traffic projections from the 2011 PEIR were used...” And “ <u>As this SEIR is a Plan-to-Plan analysis this approach is the appropriate methodology to compare the Proposed Project against the approved General Plan. No new traffic counts were conducted for this SEIR.</u> ”	Clarification

Sections 2.17.2, 2.17.3.1, 2.17.5.1, 2.17.5.2	Text revised to reflect that the CAP has been approved and is no longer “draft,” and to revise mitigation measure CC-1.2 per the approved CAP.	Accuracy
Section 4.2.1.8 under heading Groundwater Supplies and Recharge	Text revised as follows: “Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with <u>groundwater supplies and recharge</u> water quality standards and requirements. ”	Accuracy
Table 4-1, row for VC51 Analysis Area and for Totals	Revised number of Potential Dwelling Unit Alternative from 49 to <u>17</u> , and number of Potential Dwelling Unit Increase from Alternative from 5 to <u>3</u> and Totals from 664 to <u>662</u> .	Accuracy
Section 5, References, CARB 2018	Added the following reference to Section 5: <u>California Air Resources Board (CARB), 2018 Compliance Offset Program website. Online URL: https://www.arb.ca.gov/cc/capandtrade/offsets/offsets.htm</u>	To provide additional information in response to comment O3-130
Section 5, References, County of San Diego (County). 2016a	Revised reference as follows: County of San Diego (County). 2016a. San Diego County Planning & Developing Services: <u>Public Meetings Preliminary Policy Analysis Worksheets – Property Specific Requests GPA & Rezone</u> . February 2017.	Reference added to Preliminary Policy Analysis Worksheets for the PSRs that were available online in response to comment O3-18 and O3-A-3.
Section 5, References, County of San Diego (County). 2018	Revised reference as follows: County of San Diego (County). 2018 2017. Draft—Climate Action Plan. February-August. Accessed <u>May 22, 2018</u> September 20, 2017 . Online URL:	For consistency with approved CAP
Section 5, References, County of San Diego (County). 2018	Revised reference as follows: County of San Diego (County). 2018 2017. Draft—CAP Consistency Review Checklist. Online URL:	For consistency with approved CAP
Section 7.2.17.1	Added Mitigation Measure CC-1.2 to be consistent with Section 2.17.5.1.	Consistency
Appendix D, Noise Technical Report	Edited the following two sentences in the second full paragraph on page 7: “It is situated immediately to the west of land that is currently used as a junkyard <u>the former San Marcos landfill and San Marcos Recycling Center and Trash to Energy Plan building.</u> ” And - “ However, the The existing land use immediately surrounding the proposed PSR <u>on the southeast, south, and southwest</u> is open space park or preserve.”	Accuracy and in response to comment I-25-17.

Appendix E, Traffic Impact Report	Added Appendix E4 – Memorandum dated April 9, 2018 by Chen Ryan regarding Freeway Mainline Analysis	Added to support determination of no impacts to freeway segments in response to comment C3- 6, O6-3, O6- 5, O6-6 and O6-7.
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